

UNITED STATES DISTRICT COURT

for the
Middle District of Pennsylvania

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Priority Mail parcel #9405536206249286522381
addressed to Andrew Gonzalez 42 Schuylkill Ave
Shenandoah, PA 17976

Case No. 1:25-mc-00063

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment "A"

located in the Middle District of Pennsylvania, there is now concealed (identify the person or describe the property to be seized):

controlled substances, narcotic proceeds, and/or evidence of controlled substances.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

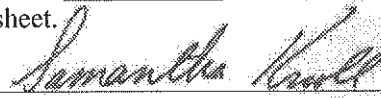
The search is related to a violation of:

Code Section	Offense Description
Title 21 U.S.C. § 841(a)(1)	Manufacture, distribute, or dispense a controlled substance
Title 21 U.S.C. § 843(b)	Use of a Communication Facility (U.S. Mail)

The application is based on these facts:

1. I, Samantha Knoll, am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since May 2012.

- ☒ Continued on the attached sheet.
- ☒ Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Samantha Knoll, U.S. Postal Inspector
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone and email (specify reliable electronic means).

Date: JAN. 15, 2025

City and state: Harrisburg, PA


Judge's signature

Daryl F. Bloom, Chief U.S. Magistrate Judge
Printed name and title

**CONTINUATION OF AFFIDAVIT IN SUPPORT
OF SEARCH WARRANT**

1. (cont'd) I am currently assigned to the Philadelphia Division, and domiciled in Harrisburg, Pennsylvania. As part of my duties, I investigate criminal violations relating to controlled substances transported via the United States mails. As part of my duties, I investigate the use of the U.S. mails to illegally send and receive controlled substances, the proceeds of drug trafficking, as well as other instrumentalities associated with drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute controlled substances), and 843(b) (unlawful use of a communication facility, including the U.S. mails, to facilitate the distribution of controlled substances). My training and experience include identifying parcels with characteristics indicative of criminal activity, completing an advanced contraband and interdiction training, and completing an online undercover operations training course. During the course of my employment with the USPIS, I have participated in hundreds of criminal investigations involving suspicious parcels and controlled substances.

2. Based on my experience with the U.S. Postal Inspection Service and the experience of other agents, I have become familiar with the mechanics of the parcel delivery services and have developed a good understanding of the appeal these services have for those who choose them for the illegal transportation of controlled substances, as well as U.S. currency generated from the distribution of controlled substances, either as payment or proceeds. Parcel delivery services offer rapid and dependable service for most metropolitan areas. Parcels are guaranteed for delivery in the number of specified days, with a refund if the parcel does not meet the service standards. To the smuggler, the refund is a minor consideration, but parcels delayed beyond the normal delivery time serve to alert the recipient that the authorities may have discovered the controlled substances or proceeds. Additionally, the sender is given a time of shipment, plus the weight of the parcel.

3. The information presented in this affidavit is not each and every fact known to the affiant and is only enough information believed to show probable cause that the suspect parcel contains drugs or drug proceeds.

4. On or about January 13, 2025, the Philadelphia Division of the U.S. Postal Inspection Service identified a suspicious Priority Mail parcel bearing tracking number 9405536206249286522381, (the “Subject Parcel”). The Subject Parcel exhibited characteristics indicative to drug and/or drug proceeds parcels. The physical characteristics of the subject parcel are as follows:

Parcel Description	Tracking# 9405536206249286522381 12” x 11.75” x 8” 4.875 pounds
Return Address	Marshel Textile Co 1501 Eastshore Hwy Berkeley, CA 94710
Delivery Address	Andrew Gonzalez 42 Schuylkill Ave Shenandoah, PA 17976

5. A query of law enforcement and postal databases shows the delivery and return addresses are valid addresses. The individual listed with the delivery address does not associate to the address, but the last name “Gonzalez” does. The business name listed with the return address does not associate to the address. Spurious names or addresses are sometimes used to disguise the true identity of the sender and/or recipient in an attempt to deny culpability of a crime.

6. On January 13, 2025, the Subject Parcel was exposed to a drug detection canine named "Zar." K-9 Zar is handled by Sergeant (Sgt) Tyron Meik of the Harrisburg Bureau of Police, K9 Unit, Harrisburg, Pennsylvania. Sgt Meik, badge #510, has been employed by the Harrisburg Bureau of Police since 1999. He has been assigned to the canine unit since 2004. Sgt Meik and K-9 Zar are a dual purpose canine team since 2017 and have undergone four weeks of training as a narcotics detection team. K-9 Zar is trained to locate the following odors: marijuana, cocaine hydrochloride, cocaine base, methamphetamine, heroin, and ecstasy. In addition to initial training, the team undergoes in-service maintenance training two – three days every month consisting of narcotics detection. Sgt Meik and K-9 Zar were certified in August 2024.

7. On January 13, 2025, Sgt Meik and K-9 Zar conducted a package lineup at the U.S. Postal Inspection Harrisburg office. First, a lineup was constructed of five (5) boxes taken from offices. K-9 Zar was run on these boxes with no alerts or indications being noted. One (1) of the five (5) boxes was removed and the Subject Parcel was placed into the lineup. K-9 Zar was then run again on the lineup. Sgt Meik advised

Postal Inspectors that Zar alerted positive to the presence of illegal narcotics inside the Subject Parcel.

8. The Subject Parcel is presently located at the United States Postal Inspection Service Office within the Middle District of Pennsylvania.

9. Based on the above information which I believe to be true and correct, I believe that the Subject Parcel contains controlled substances and/or drug proceeds sent from California to Pennsylvania via United States Mail delivery services, and that the use of the United States Mail delivery services will facilitate the delivery of the controlled substances and/or drug proceeds.

10. Wherefore I respectfully request that the Court to find probable cause and issue a search warrant authorizing the opening and search of the Subject Parcel which is believed to contain controlled substances and/or drug proceeds in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

11. Upon issuance of the requested warrant, in order to further the investigation into what is believed to be a significant drug trafficking operation, your affiant, with the approval of the United

States Attorney for the Middle District of Pennsylvania, intends to open the subject parcel to confirm its contents and then seize the parcel for further investigation into this drug trafficking organization. Your affiant submits that notice as required by Federal Rule of Criminal Procedure 41(f)(C) would jeopardize the success of the investigation into the drug trafficking operation being investigated in this case (an adverse result under 18 U.S.C. § 3103(b)(1)). Therefore, your affiant requests authorization under 18 U.S.C. § 3103(b)(1) to delay for thirty days any notice otherwise required by Federal Rule of Criminal Procedure 41(f)(C).

ATTACHMENT A

United States Postal Service Priority Mail parcel bearing tracking #9405536206249286522381 addressed to Andrew Gonzalez 42 Schuylkill Ave Shenandoah, PA 17976 measuring approximately 12" x 11.75" x 8" and weighing approximately 4.875 pounds. The return address listed on the parcel is Marshal Textile Co 1501 Eastshore Hwy Berkeley, CA 94710. The parcel is currently located at the U.S. Postal Inspection Service Harrisburg Office. A photo is attached hereto as Attachment A-1.

ATTACHMENT A-1

